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February 25, 2020

VIA ECF

The Honorable William F. Kuntz, II
United States District Court for
the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Reply All Corp. v. Gimlet Media, Inc., Civil Action No. 1:15-cv-04950-WFK-PK

Dear Judge Kuntz:

We write as counsel to Defendant Gimlet Media, Inc. (“Gimlet”) in the above-captioned matter to request an extension of time to **March 13, 2020** for Gimlet to file a motion for attorneys’ fees.

Counting from the Clerk’s Judgment dated February 14, 2020 (Dkt. 183), the current deadline for such a motion pursuant to Fed. R. Civ. P. 54(d)(2)(B)(i) is February 28, 2020. No party will be prejudiced by the requested extension and Gimlet has not previously sought an extension of this deadline. Plaintiff Reply All Corporation’s counsel indicated via an email that it does not oppose Gimlet’s request for an extension.

Further, the parties have agreed to the following proposed briefing schedule for Gimlet’s motion:

- Gimlet’s motion and supporting memorandum of law must be served on or before March 13, 2020. (This service shall constitute “filing” pursuant to Fed. R. Civ. P. 54(d)(2)(B)(i).)
- Plaintiff’s opposition brief must be served on or before April 8, 2020.
- Gimlet’s reply brief must be served on or before April 29, 2020.

The parties have also agreed there is no reason to deviate from Your Honor’s Individual Rules regarding page limits, but the parties agree and request that signature blocks not count towards page limits.

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For the foregoing reasons, Gimlet respectfully requests that the Court grant Gimlet's unopposed request to extend Gimlet's time to file a motion for attorney's fees to March 13, 2020, and otherwise enter the agreed upon briefing schedule proposed by the parties.

Respectfully submitted,

WOLF, GREENFIELD & SACKS, P.C.

A handwritten signature in black ink, appearing to read "JL".

John L. Strand (admitted *pro hac vice*)

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ John L. Strand _____